

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DEON BROWN

RECEIVED

DEC 11 2023

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

CREDIT ONE BANK

COMPLAINT

Jury Trial: ☐ Yes ☒ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	DEON BROWN
	Street Address	21 E Third St
	County, City	Burlington, Burlington
	State & Zip Code	New Jersey 08016
	Telephone Number	347-647-8500

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name CREDIT ONE BANK
 Street Address PO Box 98873
 County, City Clark County, Las Vegas
 State & Zip Code Nevada 89193

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)



Federal Questions



Diversity of Citizenship



U.S. Government Plaintiff



U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at

issue?

41 USC 6503, 15 USC 1666c, 12 USC 504, 52,233-4

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? 21 E Third St

Burlington, NJ 08016

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

15th day of November, 2023 8 pm est

C. Facts: My accounts were closed and Credit One Bank tried forcing me to make another form of payment than the one they have already received. I suffered a financial loss and Credit One Bank's reckless behavior caused me emotional distress. Also, my rights were violated

What happened to you?

Who did what?

Was anyone else involved?

Credit one bank breached its fiduciary duties, breached our contract agreement, did not apply ~~tender of payment~~ to the account on its maturity date, Credit One Bank falsely stated that my payment did not "constitute legal tender" and claimed my payment wasn't a valid instrument. Also, they falsely claimed that I was unwilling to pay them after receiving my payment. Credit One Bank received my tender of payment November 3, 2023 and the maturity date was November 15, 2023. After sending Credit One Bank three notices, they still had no intention on applying the payment to the account. Credit One Bank received notices Nov 3, Nov 17, and Nov 27 of 2023.

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

I'm suffering from mental distress due to Credit One Bank closing my accounts. Credit One Bank caused me to be low on credit and I had to adapt to a living that was unusual for me. I'm at a loss financially.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Credit One Bank shall pay a Civil Penalty of \$1,000,000 for each day during which such violation, practice, and breach continued, dating back to the 15th day of November, 2023. I shall receive \$200,000 for mental suffering and substantial loss that was caused by Credit One Bank, and also for violating my rights. I want all of my accounts that are managed by Credit One Bank to be reopened, with no issues of my tender of payment for payments in the future.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of December, 2023.

Signature of Plaintiff DEON BROWN

Mailing Address 21 E Third St

Burlington, NJ 08016

Telephone Number 347-647-8500

Fax Number (if you have one) _____

E-mail Address Deon8370@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: DEON BROWN